

EASTERN ILLINI ELECTRIC  
COOPERATIVE )

and )

CENTRAL ILLINOIS PUBLIC SERVICE  
COMPANY d/b/a AMEREN CIPS. )

DOCKET NO:

06-0700

**JOINT PETITION FOR APPROVAL  
OF REQUEST TO SERVE PURSUANT TO SECTION 4  
OF THE SERVICE AREA AGREEMENT DATED APRIL 5, 1968,  
BETWEEN EASTERN ILLINI ELECTRIC COOPERATIVE  
AND CENTRAL ILLINOIS PUBLIC SERVICE COMPANY D/B/A AMEREN CIPS**

CHIEF CLERK'S OFFICE

2006 OCT 30 A 10:38

ILLINOIS  
COMMERCE COMMISSION

EASTERN ILLINI ELECTRIC COOPERATIVE, ("EIEC"), an Illinois not-for-profit corporation, and CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS ("AmerenCIPS"), an Illinois corporation, hereby file this Joint Petition with the Illinois Commerce Commission ("Commission"), pursuant to Section 4 of the Service Area Agreement, dated April 5, 1968, and approved by the Commission by Order entered in Docket No. ESA 81, on June 19, 1968, and, in support thereof, state as follows:

1. EIEC and AmerenCIPS are both electric suppliers subject to the jurisdiction of the Electric Supplier Act (220 ILCS 30/1 et seq).

2. EIEC and AmerenCIPS entered into a Service Area Agreement dated April 5, 1968, which Service Area Agreement was approved by the Commission in Docket No. ESA 81 on June 19, 1968.

3. Section 4 of the Service Area Agreement provides as follows:

Section 4. In the event one of the parties hereto should request the other to furnish service to a consumer which such requesting party is entitled to, and obligated to serve, and the other party is willing and able to serve such consumer and does so, . . . this Agreement shall not thereby be voided, but shall to that extent be modified and shall otherwise remain in full force and effect.

4. Attached hereto as Joint Petition Exhibit A is a copy of the Request for Service from Patrick J. Harms, a customer located in the service area of AmerenCIPS, as established


by the Service Area Agreement. The Request for Service asks AmerenCIPS to allow the customer to obtain service to the premises from EIEC. EIEC has requested that AmerenCIPS allow EIEC to provide up to 150 kVA service to the premises of the customer located at the intersection of 1300 North Road and 3200 East Road near Chatsworth in Livingston County, Illinois, and containing approximately 12.88 acres, more or less. A map of the premises is attached as Joint Petition Exhibit B. EIEC's request is limited to 150 kVA service for a hog confinement operation and associated buildings at the premises described in the Request For Service. AmerenCIPS does not forego its rights, future or otherwise, to serve as allowed under the Service Area Agreement, subject to the terms of the Letter Agreement. A copy of the Letter Agreement between EIEC and AmerenCIPS is attached hereto as Joint Petition Exhibit C.

5. Approval of the Letter Agreement pursuant to Section 4 of the Service Area Agreement will tend to increase the efficiency of the Petitioners in rendering electric service to the public and will avoid duplication of facilities and minimize disputes in accordance with the public policy established by Section 2 of the ESA (220 ILCS 30/2).

6. The Letter Agreement pursuant to Section 4 of the Service Area Agreement is reasonable and in the public interest and should be approved by the Commission.

WHEREFORE, the Petitioners pray that the Letter Agreement pursuant to Section 4 of the Service Area Agreement is reasonable and in the public interest and should be approved by the Commission.

**Eastern Illini Electric Cooperative**

By:   
**William David Champion, Jr.**  
**President/Chief Executive Officer**  
**330 West Ottawa Road**  
**P.O. Box 96**  
**Paxton, IL 60957**

**AmerenCIPS**

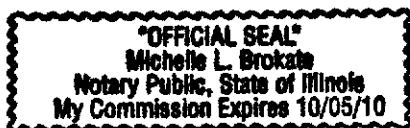
By:   
**Richard S. Wolters**  
**Brown, Hay & Stephens, LLP**  
**205 South Fifth Street, Suite 700**  
**Springfield, IL 62701**  
**(217) 544-8491**  
**[rwolters@bhslaw.com](mailto:rwolters@bhslaw.com)**

State of Illinois                     )  
  )ss  
County of Ford                     )

I **William David Champion, Jr.**, as President and Chief Executive Officer for Eastern Illini Electric Cooperative have read the foregoing Joint Petition filed in the above cause and know the content thereof, and the same is true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
**WILLIAM DAVID CHAMPION, JR.**

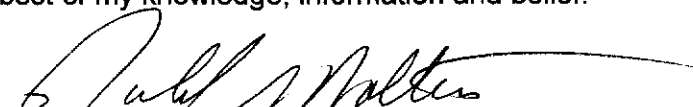
Subscribed and sworn to before me this 20 day of October, 2006.



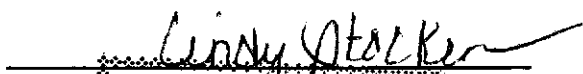
  
\_\_\_\_\_  
**Notary Public**

State of Illinois                     )  
  )ss  
County of Sangamon                     )

I, **Richard S. Wolters**, Attorney for Central Illinois Public Service Company d/b/a AmerenCIPS, have read the foregoing Joint Petition filed in the above cause and know the content thereof, and the same is true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
**RICHARD S. WOLTERS**

Subscribed and sworn to before me this 30<sup>th</sup> day of October, 2006.

  
\_\_\_\_\_  
